STATE OF CALIFORNIA—THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, *Governor*

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SMMC
ATTACHMENT 2
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ITEM 17

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OLD SMMC LETTER

Bruce W. McClendon
Los Angeles County
Department of Regional Planning
320 West Temple Street, Room 1309
Los Angeles, California 90012

Comments on County of Los Angeles Draft Preliminary General Plan Update and Significant Ecological Areas

Dear Mr. McClendon:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on Los Angeles County's proposed General Plan Update and related documents. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

Conservation/Open Space, Parks and Recreation Resources

The Conservancy agrees with the proposed County Policy C/OS 1.2:

> Create an established network of open space areas that provide regional connectivity, such as areas between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to the Puente-Chino Hills..

Biological Resources

It is critical to amend the following policy to the Conservation/Open Space Element Policy C/OS 5.1 in order to secure adequate protection of Significant Ecological areas (SEAs), given the potential for significant adverse environmental impacts from development in SEAs.

> Maintain and monitor the program and network of Significant Ecological Areas (SEAs). Proposed developments in SEAs shall include mitigation for unavoidable impacts to SEAs from the removal, conversion, or modification

> of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

The following policy should be added after Policy C/OS 5.1 to promote, monitor and ensure efforts to protect wildlife corridors.

> Site roads to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as road kill) during continued operation of existing roadways and construction of new and expanded roadways.

The General Plan should show where potential habitat linkages remain to connect large regional open space areas, for example, specifically (a) across State Route-14 between Santa Clarita and Palmdale, and (b) across Interstate-5, north of Castaic to the Los Angeles County/Kern County line. The Missing Linkages study (SCWP 2000) addressed numerous habitat linkages, including the two aforementioned. These areas must receive special wildlife corridor designation in the County General Plan Update.

Policy C/OS 5.3 addresses maintaining the integrity of the County's diverse plant communities. Other sensitive and declining plant communities, including coastal sage and native grasslands, should be considered in this policy, in addition of those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game (CDFG).[1] It has been estimated that about 70-90 percent of the pre-settlement coastal sage scrub in Southern California has been destroyed primarily by residential development. [2] Coastal sage scrub also supports a suite of sensitive wildlife and plant species. With respect to native grasslands, it has been estimated that there has been about 99 percent loss of native grassland in California.[3] Valley needlegrass grassland is recognized as very threatened by CDFG. The County should revise the statement C/OS 5.3

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[1] See sensitivity rankings "Sensitivity of Top Priority Rare Natural Communities in Souther California," determined by the California Department of Fish and Game.

[2] As cited in Noss et al.

[3] Kreissman 1991, as cited Noss et al.

as follows :

> "Maximize the ecological function of the County's diverse natural habitats, such as Joshua Trees, native Oak woodlands, Coastal sage scrub, Valley and needlegrass grasslands, and other perennial grasslands."

SEA Project Review – Minor Conditional Use Permit for SEA (Minor SEA-CUP)

Under Biological Resources in Chapter 3 of the Open Space/Conservation Chapter in the General Plan, some exemptions would include new individual homes or desires an accessory to their single-family home within an SEA, a simple site plan review is only needed to verify that zoning standards are observed. This is an administrative procedure that the County deems unnecessary for the Minor SEA-CUP review.

There are numerous scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts, either individually or cumulatively, without adequate avoidance, mitigation, or public review. These procedures also state that if the project(s) on parcels located partially within an SEA, (provided the development area is outside of the SEA), the activity is exempt. Such a sweeping provision would not work with lots 2-acres or larger because both non-structural and future development can result in significant, ecological adverse impacts. For this reason, the proposed single family exemption from a CUP leaves a significant gap in protection. Any acreage above and beyond 2-acres should either be permanently protected with an irrevocable deed restriction or a conservation easement to a public park agency. Such deed restriction or conservation easement must prohibit all future development, including agriculture, non-native plants, equestrian facilities and non-fire department required brush clearance.

SEA-CUP with Significant Ecological Area Technical Advisory Committee (SEATAC) Review

The SEA Regulatory Review Procedures for CUPs (including SEATAC review) should provide the highest level of protection because realistically, large scale subdivision projects could potentially result in the greatest impacts to the SEAs. The following statement should be amended to:

> "Recommendations ~~may~~ will include the clustering of structures away from sensitive areas, and then dedicating the area as natural open space to a public park agency. Other recommendations may include limiting lighting, protection of habitat linkages and movement corridors, providing wildlife-

> permeable fencing, and maintaining a short distance between existing infrastructure regulating new development to limit grading of natural vegetation."

Scenic Resources

Upon review, the Conservancy recommends that the following statement to be amended as follows in Figure 5.6:

> Preserve ~~significant~~ sensitive trees and habitats, natural watercourses, wildlife corridors and distinctive natural features.

Los Angeles' landscape is filled with hillside, scenic resources. It is essential to recognize the need to preserve important significant viewsheds found within the County. The Conservancy strongly recommends that the grading percentage qualification should be reduced from 25% to 15% under the Hillside Management Ordinance and the Hillside Management CUP. Topography and natural biological resources enable the residents of Los Angeles County to enjoy all the scenic resources, including the hillsides.

Soledad Canyon, Angeles Connector

The Angeles Connector, also known as the Soledad Canyon Conceptual Area Protection Plan (CAPP), is a critical wildlife movement zone. The Connector is a critical biological pathway linking the two portions of the Angeles National Forest. Though it may not qualify as a SEA, the Conservancy strongly recommends that the CAPP area be included as a wildlife movement area in the County General Plan and all open space and SEA maps. Portions of the CAPP have been included alongside the Santa Clara River SEA (SEA 25), and a copy of the CAPP boundaries is attached.

Significant Ecological Areas

The comments in this section refer to the draft documents and maps from the Los Angeles County Department of Regional Planning Website entitled "Significant Ecological Areas", proposed as part of the General Plan Update. The Conservancy notes that the proposed SEAs are noticeably larger than those that are currently adopted within the County. The Conservancy continues to commend the County and the consultant team on the excellent work done for designating the boundaries of the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The Conservancy appreciates the

County's efforts on incorporating some of the Conservancy's prior recommendations regarding SEA boundaries.

SEA 27, Santa Susana Mountains and Simi Hills

The Significant Ecological Area of the Santa Susana Mountains and Simi Hills should be expanded to include the following vital biological resources. A key part of supporting the SEA are the Big Cone Fir trees between Interstate-5 (I-5) and California State Route-14 (SR-14) in the southern boundary of the City of Santa Clarita and unincorporated Los Angeles County. The proposed boundary of SEA 27 at the junction I-5 and SR-14 lies just south of protecting a critical wildlife movement corridor that connects the Santa Susana Mountains from the west to the San Gabriel Mountains to the east. The wildlife corridor pathway is wedged between the two highways and crosses through the unique Big Cone Fir trees. The Conservancy strongly recommends that SEA 27 boundary be extended northward to encompass much more of the Big Cone Fir trees.

SEA 25, Santa Clara River

The Santa Clara River is a long, delicate Significant Ecological Area. The SEA boundaries near Agua Dulce Canyon and south of SR-14, should be extended east towards Escondido Canyon where there is an existing wildlife corridor leading to SR-14 lies just east of the Agua Dulce Canyon boundary found in SEA 25.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above Ramirez Canyon Park address provided above.

Sincerely,

Elizabeth A. Cheadle

ELIZABETH A. CHEADLE
Chairperson